

EXHIBIT A

08-1633-TSH

AFFIDAVIT OF SPECIAL AGENT SARAH DE LAIR

I, Sarah De Lair, having been first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI"), United States Department of Justice, and have been so employed for approximately four years. I am currently assigned to the Lakeville Resident Agency, within the Boston Division. My responsibilities include the investigation of various criminal offenses, including the investigation of crimes involving the sexual exploitation of children via computer telecommunications. I have attended training concerning the sexual exploitation of children, including the Child Exploitation National Symposium given by the Department of Justice in 2004 and the 2006 and 2007 Crimes Against Children Conference.

2. This affidavit is submitted in support of an application for a warrant to search the residence known as 7 Wellington Road, Wareham, Massachusetts (MA), more fully described in **Schedule A** of this affidavit.

3. The statements contained in this affidavit are based upon my investigation, information provided by other FBI agents, other personnel specially trained in the seizure and analysis of computers and electronic media, and on my experience and training as a Special Agent of the FBI. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this

investigation. I have set forth only the facts that I believe are necessary to establish the requisite probable cause for the issuance of a search warrant for the Subject Premises.

COMPUTERS AND CHILD PORNOGRAPHY

4. I have participated in investigations of persons suspected of violating federal child pornography laws, including Title 18, United States Code, Sections 2251, 2252 and 2252A. I have also participated in various FBI mandated and volunteer training for the investigation and enforcement of federal child pornography laws in which computers are used as the means for receiving, transmitting, and storing child pornography. Child pornography is defined in Title 18, United States Code, Section 2256.

5. Computers and computer technology have revolutionized the way in which individuals interested in child pornography interact with each other. Child pornography formerly was produced using cameras and film (either still photography or movies). The photographs required darkroom facilities and a significant amount of skill in order to develop and reproduce the images. There were definable costs involved with the production of pornographic images. To distribute these images on any scale required significant resources. The photographs themselves were somewhat bulky and required secure storage to prevent their exposure to the

public. The distribution of these wares was accomplished through a combination of personal contacts, mailings, and telephone calls.

6. The development of computers has changed this; computers serve four basic functions in connection with child pornography production, communication, distribution, and storage.

7. Child pornographers can now transfer photographs from a camera onto a computer-readable format with a device known as a scanner. With the advent of digital cameras, the images can now be transferred directly onto a computer. A device known as a modem allows any computer to connect to another computer through the use of telephone, cable, or wireless connection. Electronic contact can be made to literally millions of computers around the world.

8. The computer's ability to store images in digital form makes the computer itself an ideal repository for child pornography. The size of the electronic storage media (commonly referred to as the hard drive) used in home computers has grown tremendously within the last several years. These drives can store hundreds of thousands of images at very high resolution.

9. In addition to electronic communications, a computer user's Internet activities generally leave traces or "footprints" in the web cache and history files of the browser used. A forensic examination of a computer can often reveal what websites an individual has accessed and images he/she has downloaded. Such information may be maintained indefinitely until overwritten by

other data. Due to the size of modern hard-drives, I know that the odds of a specific piece of information being randomly overwritten becomes quite small, thus leaving the information potentially available for extraction by a forensic examiner.

OVERALL BACKGROUND

10. The Innocent Images Unit (IIU) and U.S. Immigration and Customs Enforcement, as part of a joint initiative, have conducted numerous covert transactions to gain access to commercial websites purporting to offer child pornography.

11. Of the hundreds of transactions conducted by the IIU and ICE as part of this initiative, a majority have involved a payment website bearing the name "iWest". Over two hundred different child pornography websites processed their payments through the iWest webpage. These websites, which advertise nude images of minors ranging in age from approximately five to sixteen years old, were active on several different URLs which would typically not be active for more than a few days at a time. The members URL which would be provided to the purchaser after a successful transaction would typically remain active for a longer period of time. All of the websites accessed by IIU and ICE advertising paid access to child pornography, which connected to an iWest payment webpage to complete the transaction, contained images of child pornography on the initial pages and on all preview pages. The iWest entity does not appear to exist outside

of these child pornography websites.

DETAILS OF THE INVESTIGATION

12. On 10/22/2007, Senior Detective on Special Cases Pavel Dudko, High-Tech Crime Department, Ministry of Internal Affairs (MIA), Belarus, provided the IIU with an excel spreadsheet consisting of almost 33,000 iWest transactions conducted by individuals in the United States. Dudko was previously a member of the Innocent Images International Taskforce at the IIU in Calverton, Maryland. The spreadsheet contains all of the information entered by the purchaser, including name, address, email address, telephone number, and payment information. Other information pertaining to the transaction, such as the date, time, IP address of the purchaser's computer, and the name of the website the purchaser was attempting to purchase access to, are included in the spreadsheet.

13. The spreadsheet revealed that an individual using the name LAWRENCE K. LAPLANTE, IP address 72.24.164.255, e-mail address haikutwo@comcast.com, address 7 Wellington Road, Onset, MA, telephone number (508) 274-2708, and credit card number 4465682200419898, attempted to subscribe to several websites, to include Sexy Angels, by utilizing the iWest payment webpage. The spreadsheet further revealed fifteen successful transactions between 02/27/2007 and 07/26/2007. These transactions were for access to websites with the following titles: UNDERAGE HOME,

VLOLITZ, Home Collection, LOLITAPLAY, ANGELS GIRLS, Sexy Angels, KIDZ INDEX, HL package, CP HOME VIDEO, REALLOLA vol.2, Desired Angels, LS Dreams 6. Based on my training and experience, I believe that the names of these websites indicate that they are likely to be child pornography websites. As an example, I know that "CP" is a common abbreviation for child pornography. In addition, I know that "lolita" "lolitz" and "lola" are terms often associated with child pornography. The price paid to subscribe to the websites referenced above ranged from \$79.95 to \$99.95.

14. ISS Julie A. Harper used an Internet tool and determined that Comcast holds the registration on the IP address 72.24.164.255. Subsequently, a United States Department of Justice administrative subpoena was submitted to Comcast, requesting subscriber information for the user of IP address 72.24.164.255 on July 26, 2007 at 12:06:40 P.M. (G.M.T.), which was the time the website subscription was attempted via iWest.

15. Results from the administrative subpoena indicated the subscriber to IP address 72.24.164.255, during the time frame given above, was Lawrence Laplante, 7 Wellington Road, Wareham, MA, email address kaikutwo@comcast.com. The account provides internet service to the above address.

16. On April 11, 2007, an Agent, working in an undercover capacity (UCE), purchased access to the website Sexy Angels, the website Laplante purchased access to on two separate occasions,

including 05/27/2007 and 07/09/2007. The UCE filled out personal information such as name, e-mail, physical address, and credit card information on the iWest payment page. After paying the subscription fee, the UCE was provided with the member URL for the Sexy Angels website and was granted access to the Sexy Angels website for approximately 30 days. Although the iWest payment page requested a credit card number, iWest did not accept credit cards as a form of payment at that time. The iWest payment page appeared to accept credit card payments, however users would be re-directed to PayPal for payment.

17. On April 16, 2007, the UCE accessed the Sexy Angles member URL through the server "sexyangels.freeawh.com". The UCE conducted a screen capture of what appeared on the computer screen before gaining access to the Sexy Angels site (copy attached). Numerous depictions of child pornography were present on the Sexy Angels website. I have reviewed the depictions of child pornography referenced above and have probable cause to believe they depict minors engaged in sexually explicit conduct. Copies of each of the depictions of child pornography referenced above will be provided for the Court's review with this Affidavit. I have also reviewed screen shots from the CP HOME VIDEO and UNDERAGE HOME sites, which are additional sites subscribed to by an individual using the name Lawrence K. Laplante, 7 Wellington Road, Onset, MA. Each of those contained

images of minors engaged in sexually explicit conduct. Those screen shots will be provided for the Court's review with this Affidavit.

18. On January 09, 2008, a query was conducted of the Commonwealth of Massachusetts Registry of Motor Vehicles database. This query lists a valid driver's license for Lawrence Laplante, 7 Wellington Road, Wareham (Onset), MA.

19. On February 11, 2008, U.S. Postal Inspector Tom Hamilton performed a check of the occupants to whom mail was being delivered at 7 Wellington Road, Wareham, MA. She concluded that Lawrence K. Laplante was the only individual receiving mail at 7 Wellington Road, Wareham, MA.

20. On January 30, 2008, I conducted a physical surveillance of 7 Wellington Road, Wareham, MA. I observed that the address is a one-story light green and blue ranch-style dwelling with an attic. While facing the dwelling from the street there is an attached one car garage to the left. On the right, there is a porch that wraps around half of the front and right side of the residence. There are two doors located on the front porch. The number "7" is affixed to the right support beam of the porch.

21. Based upon my conversations with experienced law enforcement officers, including FBI SA Steven Forrest, who specializes in child exploitation and child pornography

investigations, I know there are certain characteristics common to individuals who have demonstrated a persistent interest in child pornography. Specifically, such individuals almost always possess and maintain their copies of child pornographic material in the privacy and security of their home or some other secure location. In addition, they usually retain pictures, film, photographs, correspondence and videotapes for many years because these images are highly valued. I believe there is probable cause to believe that Lawrence Laplante is an individual with a persistent interest in child pornography. This is based on the high number of apparent child pornography websites for which Laplante purchased access, in addition to the high price Laplante paid for each of those websites. Based on my training and experience, I am aware that \$79.95 and \$99.95 are significant prices to pay for access to a website.

SPECIFICS OF SEARCH AND SEIZURE OF COMPUTER SYSTEMS

22. Searches and seizures of evidence from computers commonly require agents to download or copy information from the computers and their components, or seize most or all computer items (computer hardware, computer software, and computer related documentation) to be processed later by a qualified computer expert in a laboratory or other controlled environment. This is almost always true

because of the following:

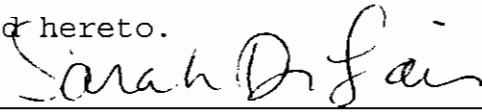
a. Computer storage devices (like hard disks, diskettes, tapes, laser disks, magneto opticals, and others) can store the equivalent of thousands of pages of information. Especially when the user wants to conceal criminal evidence, he or she often stores it in random order and with deceptive file names. This requires searching authorities to examine all the stored data to determine whether it is included in the warrant. This sorting process can take days or weeks, depending on the volume and data stored, and it would be generally impossible to accomplish this kind of data search on site; and

b. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert should analyze the system and its data. The search of a computer system is an exacting scientific procedure which is designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to tampering or destruction (which may be caused by malicious code

or normal activities of an operating system), the controlled environment of a laboratory is essential to its complete and accurate analysis.

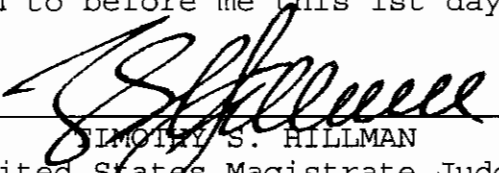
CONCLUSION

23. Based on the foregoing, I believe that there is probable cause to believe that there exists evidence, fruits and instrumentalities of violation of Title 18, United States Code, Sections 2252(a)(1), (a)(2), and (a)(4)(B) located at 7 Wellington Road, Wareham (Onset), MA, as more fully described in Schedule B attached hereto.



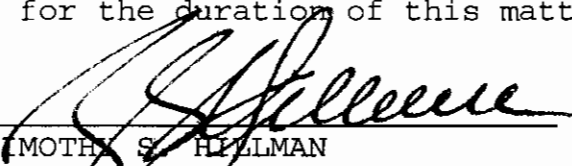
Sarah De Lair
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 1st day of April, 2008.



TIMOTHY S. HILLMAN
United States Magistrate Judge

I have reviewed the image files references above, and I find probable cause to believe they depict minors engaged in sexually explicit conduct. The U.S. Attorney's shall maintain these images for the duration of this matter.



TIMOTHY S. HILLMAN
United States Magistrate Judge

EXHIBIT B

FROM_UNIXTIME(echo_join2user_time)	user_tz	country	state	city	province	zip
2/27/2007 12:48:38 PM	300	US	MA	ONSET		02558
2/27/2007 1:19:04 PM	300	US	MA	ONSET		02558
2/27/2007 3:11:19 PM	300	US	MA	ONSET		02558
2/28/2007 5:20:31 AM	300	US	MA	ONSET		02558
3/2/2007 10:21:29 AM	300	US	MA	ONSET		02558
5/27/2007 10:27:16 AM	240	US	MA	ONSET		02558
5/27/2007 11:31:37 AM	240	US	MA	ONSET		02558
7/24/2007 10:15:33 AM	240	US	MA	ONSET		02558
7/26/2007 2:17:02 PM	240	US	MA	ONSET		02558
7/26/2007 2:15:00 AM	240	US	MA	ONSET		02558
7/26/2007 10:05:10 AM	240	US	MA	ONSET		02558
7/20/2007 3:26:22 AM	240	US	MA	ONSET		02558
5/20/2007 2:56:51 PM	240	US	MA	ONSET		02558
7/9/2007 7:55:22 PM	240	US	MA	ONSET		02558
7/8/2007 6:05:44 AM	240	US	MA	ONSET		02558

id	real_ip	code_country	FROM_UNIXTIME(eco_join2times)
51933	66.30.232.69	US (United States)	2/27/2007 10:46:36 AM
51941	66.30.232.69	US (United States)	2/27/2007 11:14:09 AM
51971	66.30.232.69	US (United States)	2/27/2007 1:07:49 PM
52281	66.30.232.69	US (United States)	2/28/2007 3:21:13 AM
53153	66.30.232.69	US (United States)	3/2/2007 8:15:56 AM
75534	76.24.164.128	US (United States)	5/27/2007 8:26:59 AM
75545	76.24.164.128	US (United States)	5/27/2007 9:21:24 AM
99698	76.24.164.255	US (United States)	7/24/2007 8:05:12 AM
100256	76.24.164.255	US (United States)	7/26/2007 12:06:40 PM
100128	76.24.164.255	US (United States)	7/26/2007 12:07:35 AM
100223	76.24.164.255	US (United States)	7/26/2007 7:59:09 AM
98435	76.24.176.19	US (United States)	7/20/2007 1:12:37 AM
73886	76.24.176.8	US (United States)	5/20/2007 12:49:22 PM
95693	76.24.177.186	US (United States)	7/9/2007 5:44:00 PM
85757	76.24.177.186	US (United States)	7/8/2007 3:53:44 AM

screen_w	screen_h	screen_c	lang_lang	lang_sys	lang_brow	lang_user	title	url
1280	1024	32	undefined	en-us	en-us	en-us	UNDERAGE HOME	http://mclt-sites.net/home/main/
1280	1024	32	undefined	en-us	en-us	en-us	VLOLITZ	http://mclt-sites.net/vloitz/main/
1280	1024	32	undefined	en-us	en-us	en-us	Home Collection	http://google.com/
1280	1024	32	undefined	en-us	en-us	en-us	LOLITAPLAY	http://mclt-sites.net/play/main/
1280	1024	32	undefined	en-us	en-us	en-us	ckCR Package v5.06 Build 3638	
1280	1024	32	undefined	en-us	en-us	en-us	ANGELS GIRLS	http://google.com
1280	1024	32	undefined	en-us	en-us	en-us	Sexy Angels	http://face.cuteloblog.biz/sexyangels/
1280	1024	32	undefined	en-us	en-us	en-us	KIDZ INDEX	http://happyola.info/iw/
1280	1024	32	undefined	en-us	en-us	en-us	HL package	http://www.hardloverssite.com
1280	1024	32	undefined	en-us	en-us	en-us	CP HOME VIDEO	http://cphomevideo.us
1280	1024	32	undefined	en-us	en-us	en-us	ANGELS GIRLS	http://google.com
1280	1024	32	undefined	en-us	en-us	en-us	REALLOLA vol.2	http://issue2.lolalove.info/iw/
1280	1024	32	undefined	en-us	en-us	en-us	Desired Angels	http://face.cuteloblog.biz/desired/
1280	1024	32	undefined	en-us	en-us	en-us	Sexy Angels	http://face.cuteloblog.biz/sexyangels/
1280	1024	32	undefined	en-us	en-us	en-us	LS Dreams 6	http://www.ls-dream.com

members

<http://registermembers.net/members/home/>
<http://registermembers.net/members/violitz/>
<http://homecollection.freeawh.com/members/>
<http://registermembers.net/members/model/>
<http://65.111.175.136/memscr/>
<http://paymembers.biz/members/angels-girl/>
<http://sexyangels.freeawh.com/members/>
<http://members.happyloia.info/members/>
<https://har.merseine.nu:11111>
<http://4cphomevideo.info>
<http://paymembers.biz/members/angels-girl/>
<http://issue2-members.lolalove.info/members/>
<http://desired.freeawh.com/members/>
<http://sexyangels.freeawh.com/members/>
<http://members6.ls-dreams.biz/>

script

<http://registermembers.net/members/home1.php>
<http://registermembers.net/members/violitz1.php>
<http://homecollection.freeawh.com/iwest.php>
<http://registermembers.net/members/play1.php>
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http://paymembers.biz/members/iwe_angels.php
<http://sexyangels.freeawh.com/iwest.php>
<http://members.happyloia.info/iw/update.php>
http://69.50.183.226/_update/hl/update.php
<http://cphomevideo.us/useradd.php>
http://paymembers.biz/members/iwe_angels.php
<http://issue2-members.lolalove.info/iw/update.php>
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<http://sexyangels.freeawh.com/iwest.php>
<http://pay.aspire-systems.biz/isd6/update.php>

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yes1101@hotmail.com□members info sent 27.0(79.95	30	26	16
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yes1101@hotmail.com□members info sent 27.0(79.95	30	26	16
webfs@email.com□members info sent 02.03.20(99.95	30	38	20
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yes1101@hotmail.com□members info sent 24.0(79.95	30	26	13
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